

1/14/99

Mr. James G. Mills
Division of Enforcement, Rm. 4616
Federal Trade Commission,
Washington, DC

Re: Care Labeling Rule

Dear Mr. Mills,

I write in response to the announcement made seeking comments from interested parties. I would like to comment on both the issues listed.

1) The rule already specifies that the care label should be such that provide best possible means of washing the garment without harming the garment. If washing at home harms the garment then it should be labeled as drycleanable garment. Some guidelines on criteria for providing care label is given in ASTM-D3938-96.

Consumer favors home laundering (which is greener, provided the detergents used are greener), and trend has been towards labeling the garment with machine washable label. Tendency should be towards favoring the greener label which is consumer friendly, rather than have multiple labels and increase the cost of providing the label. First preference for the care label should be for the Machine Laundering instruction. If it is found that the garment would be harmed by machine washing then the second preference should be given to hand laundering instruction, third preference should be wet cleaning instruction and last should be drycleaning instruction.

2) It is being proposed to modify the care-label to accommodate the wet cleaning method that are environmentally friendly. I am in favor of these modifications, however, these modifications should be based on some guidelines and criteria. There are existing methods and guidelines in place to provide the most suitable label, however, there is no such method in place for the wet cleaning process. I recommend that a method be put in place with the following requirements defined:

- type of wet cleaning equipment that represents different kind of wet cleaning equipment available that would be used.
- type of detergent that represents the existing detergents sold in the market.
- washing conditions.
- number of cycles.
- restoration procedure.
- etc.

Thank you for your consideration.

Best regards

Nick Agrawal
Technical Manager

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